

Hearing Date and Time: February 3, 2011 at 9:45 a.m.

Objection Deadline: January 27, 2011 at 4:00 p.m.

GREENBERG TRAURIG, LLP

Bruce R. Zirinsky, Esq.

Nancy A. Mitchell, Esq.

John H. Bae, Esq.

Gary D. Ticoll, Esq.

MetLife Building

200 Park Avenue

New York, New York 10166

Telephone: (212) 801-9200

Facsimile: (212) 801-6400

Email: zirinskyb@gtlaw.com

mitchelln@gtlaw.com

baej@gtlaw.com

ticollg@gtlaw.com

*Counsel for Appaloosa Management L.P., Aurelius Capital Management, LP,  
Elliott Management Corporation, and Fortress Investment Group LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No. 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF HEARING ON MOTION OF CERTAIN NOTEHOLDERS PURSUANT TO  
RULE 3018(a) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE  
FOR TEMPORARY ALLOWANCE OF THE NOVA SCOTIA GUARANTY  
CLAIMS FOR THE PURPOSE OF VOTING TO ACCEPT OR REJECT THE PLAN**

PLEASE TAKE NOTICE that upon the Motion of Appaloosa Management L.P., Aurelius Capital Management, LP, Elliott Management Corporation, and Fortress Investment Group LLC (collectively, the “**Moving Parties**”), each on behalf of their managed entities, Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Temporary

Allowance of the Nova Scotia Guaranty Claims for the Purpose of Voting to Accept or Reject the Plan, dated January 10, 2011 (the “**Motion**”),<sup>1</sup> the Moving Parties shall move this Court for an order temporarily allowing the Nova Scotia Guarantee Claims in the amount of \$1,072,557,531.72 solely for purposes of voting on the Debtors’ Amended Joint Chapter 11 Plan.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be made in writing, with a hard copy to chambers, conform to the Federal Rules of Bankruptcy Procedures and the Local Rules of the Bankruptcy Court and be filed with the Court and served in accordance with the *Fifth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures* in these cases [Docket No. 8360] so as to be actually received not later than January 27, 2011 at 4:00 p.m.

[Remainder of page intentionally left blank.]

---

<sup>1</sup> Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Motion.

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Motion, the relief requested in the Motion may be granted without a hearing.

Dated: New York, New York  
January 10, 2011

GREENBERG TRAURIG, LLP

By: /s/ John H. Bae  
Bruce R. Zirinsky, Esq.  
Nancy A. Mitchell, Esq.  
John H. Bae, Esq.  
Gary D. Ticoll, Esq.  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 801-9200  
Facsimile: (212) 801-6400  
Email: zirinskyb@gtlaw.com  
mitchelln@gtlaw.com  
baej@gtlaw.com  
ticollg@gtlaw.com

Counsel for Appaloosa Management L.P., Aurelius  
Capital Management, LP, Elliott Management  
Corporation, and Fortress Investment Group LLC